

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

WILLIAM SEALEY AND]	
J. MICHAEL NEUSE, on Behalf of]	
Themselves and Others Similarly Situated]	C.A. NO. 2:11-cv-00120
]		
<i>Plaintiffs,</i>		
]		
v.]	COLLECTIVE ACTION
]		
]		
EMCARE, INC.,]	
ANESTHESIACARE.,]	
AND CLINICAL PARTNERS, P.A.,]	
]		JURY TRIAL DEMANDED
<i>Defendants.</i>		
]		

PLAINTIFFS' OBJECTIONS TO DEFENDANTS' TRIAL EXHIBITS

Defendants' Exhibit No.	Description of Exhibit	Plaintiffs' Objection(s)
1	JP Civil Case Search Detail for Smith County Precinct 2, William Sealey v Slayton Slayton, Gina Davis and Katie Short – Forcible Entry Detainer, Agreed Judgment Disposition (Sealey Deposition Exhibit 2)	Defendants have agreed to withdraw this Exhibit.
2	Secretary of State Website Search Results for Sealey and Sealey Anesthesia Service Inc. (Sealey Deposition Exhibit 3)	Defendants have agreed to withdraw this Exhibit.
3	2006 Income Tax Return (Sealey Exhibit 4)	Defendants have agreed to withdraw this Exhibit.
4	2007 Income Tax Return and 1099 at the end of the document (Sealey Deposition Exhibit 5)	Defendants have agreed to withdraw this Exhibit.
5	2008 Income Tax Return (Sealey Deposition Exhibit 6)	Defendants have agreed to withdraw this Exhibit.
8	2006 Corporate Tax Return (Sealey Deposition Exhibit 9)	Defendants have agreed to withdraw this Exhibit.
9	2007 Corporate Tax Return (Sealey Deposition Exhibit 10)	Defendants have agreed to withdraw this Exhibit.

10	2008 Corporate Tax Return (Sealey Deposition Exhibit 11)	Defendants have agreed to withdraw this Exhibit.
25	8/15/05 Independent Anesthesia Services Coverage Agreement Amendment One to El Paso Tenet Anesthesia Services Agreement between Clinical Partners P.A. and Mike Neuse (Neuse Deposition Exhibit 7, EMC 000082-83)	Defendants have agreed to withdraw this Exhibit.
26	4/15/05 Independent Anesthesia Services Coverage Agreement Amendment Two to El Paso Tenet Anesthesia Services Agreement between Clinical Partners P.A. and Mike Neuse (signed 3/29/07) (Neuse Deposition Exhibit 8, EMC 000429-430)	Defendants have agreed to withdraw this Exhibit.
31	2005, 2006 Austin, TX Political Contributions by Individuals (Constantikes Deposition Exhibit 2)	Irrelevant; lack of authentication; hearsay
32	Internet profile for James G. Constantikes, CRNA – El Paso, TX (Constantikes Deposition Exhibit 3)	Irrelevant, lack of authentication; hearsay
36	8/15/05 El Paso Tenet CRNA Anesthesia Services Agreement between Clinical Partners P.A. and James G. Constantikes and Amendments (Constantikes Deposition Exhibit 8, EMC 001092-1107)	Defendants have agreed to withdraw this Exhibit.
37	1/29/05 El Paso Tenet CRNA Anesthesia Services Agreement between Clinical Partners P.A. and James G. Constantikes (Constantikes Deposition Exhibit 9, EMC 001108-1113)	Defendants have agreed to withdraw this Exhibit.
38	1/29/05 El Paso Tenet CRNA Anesthesia Services Agreement between Clinical Partners P.A. and James G. Constantikes (Constantikes Deposition Exhibit 10, EMC 001096-1107)	Defendants have agreed to withdraw this Exhibit.
65	6/1/03 Anesthesia Services Agreement between Clinical Partners and Steven Patterson (Patterson Deposition Exhibit 5, EMC 001071-1076)	Defendants have agreed to withdraw this Exhibit.
74	9/9/11 Plaintiff William Sealey's Responses and Objections to Defendants' First Set of Requests for Production	Defendants have agreed to withdraw this Exhibit.
75	9/9/11 Plaintiff J. Michael Neuse's Responses and Objections to Defendants' First Set of Requests for Production	Defendants have agreed to withdraw this Exhibit.
78	8/30/12 Plaintiffs Michael Neuse's and William Sealey's Combined Objections to	Defendants have agreed to withdraw this Exhibit.

	Defendants' Second Set of Request for Documents	
80	8/30/12 Opt-Ins' Combined Objections to Defendants' First Set of Requests for Production	Defendants have agreed to withdraw this Exhibit.
83	10/5/12 Plaintiff Steven L. Patterson's Responses and Objections to Defendants' First Set of Requests for Production	Defendants have agreed to withdraw this Exhibit.
85	10/15/12 Plaintiff J. Michael Neuse's Responses and Objections to Defendants' Second Set of Requests for Documents	Defendants have agreed to withdraw this Exhibit.
89	10/29/12 Plaintiff Angelika Raines' Responses to Defendants' First Set of Requests for Production	Defendants have agreed to withdraw this Exhibit.
90	10/29/12 Plaintiff Carlos Raines' Responses to Defendants' First Set of Requests for Production	Defendants have agreed to withdraw this Exhibit.
91	11/9/12 Plaintiff William Sealey 's Responses to Defendants' Second Set of Requests for Documents	Defendants have agreed to withdraw this Exhibit.
104	5/31/12 Notice of Consent (W.Sealey)	Defendants have agreed to withdraw this Exhibit.
130	Web pages for W. Sealey, Nurse Anesthetist, Certified Registered and for Sealey & Sealey Anesthesia Service Inc.	Lack of authentication; irrelevant; hearsay.
131	Web pages for J. Michael Neuse, Dreamcatcher Anesthesia Ltd, Nurse Anesthetist, Certified Registered	Lack of authentication; irrelevant; hearsay.
132	Web pages for Angelika H. Raines, Nurse Anesthetist, Certified Registered	Lack of authentication; irrelevant; hearsay.
133	Web pages for Carlos Raines, Nurse Anesthetist, Certified Registered	Lack of authentication; irrelevant; hearsay.
134	Web pages for James Patterson, Nurse Anesthetist, Certified Registered	Lack of authentication; irrelevant; hearsay.

Dated: March 11, 2013

Respectfully submitted,

BRUCKNER BURCH PLLC**/s/ James A. Jones**

By: _____

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CERTIFICATE OF CONFERENCE

I conferred with counsel for Defendants regarding the subject matter of these objections. Agreement was reached on those Exhibits noted as withdrawn. No agreement could be reached on the remaining Exhibits. Thus, those objections are submitted to the Court for determination.

/s/ James A. Jones

James A. Jones

CERTIFICATE OF SERVICE

I served a copy of this document on all counsel via the Court's ECF system.

/s/ James A. Jones

James A. Jones